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March 29, 2011

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Petitions Regarding the Use of Signal Boosters and Other Signal Amplification Techniques Used With Wireless Services, WT Docket No. 10-4; Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers, WT Docket No. 05-265

Dear Ms. Dortch:

On March 28, 2011, Tamara Preiss of Verizon and Andy Lachance and Scott Townley of Verizon Wireless met separately with (1) Louis Peraertz, Legal Advisor to Commissioner Clyburn; (2) Charles Mathias, Senior Legal Advisor, and Rafi Martina, Legal Fellow, to Commissioner Baker; (3) Angela Giancarlo, Chief of Staff and Senior Legal Advisor to Commissioner Robert McDowell; and (4) Michael McKenzie, Tom Peters, David Goldman, and Roger Noel, of the Wireless Telecommunications Bureau, to discuss signal booster issues raised in WT Docket No. 10-4. Except in the meeting with the Wireless Bureau, we also discussed the Further Notice of Proposed Rulemaking in WT Docket No. 05-265. Kathleen Grillo of Verizon also attended the meeting with Ms. Giancarlo.

During the meetings, we made clear that Verizon supports CTIA's 2007 Petition for Declaratory Ruling that it is unlawful to operate boosters without a license or consent of the licensee, but we expressed concern about the FCC's proposed interim rules regarding acceptable booster design. We explained that the proposed safeguards relating to automatic gain control and oscillation detection are insufficient to prevent harmful interference, including interference to public safety operations and to commercial users attempting to dial 911. We used the attached spreadsheet to illustrate these concerns. We urged the FCC not to adopt interim rules and instead to address issues regarding the operation of signal boosters on the basis of a full record developed in response to a notice of proposed rulemaking.

With respect to data roaming, we explained that a draft order that "requires a facilities-based provider of commercial mobile data services to offer roaming arrangements to other such providers on commercially reasonable terms and conditions"[1] constitutes a common carrier requirement that the Commission lacks authority to impose on wireless broadband services.

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[1] *See* Letter to Honorable Lee Terry, Vice Chairman, Subcommittee on Communications and Technology, Committee on Energy and Commerce, House of Representatives, from Chairman Julius Genachowski, March 17, 2011.

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's Rules. Should you have any questions regarding this letter, please contact the undersigned.

Sincerely,

Attachment

cc: Louis Peraertz
Charles Mathias
Rafi Martina
Angela Giancarlo
Michael McKenzie
Tom Peters
David Goldman
Roger Noel

Date	Booster Make/Model	Location	Booster Features	Nature of Interference	Reason for Interference	Man Hours to Resolve
2/25/2011 through 3/4/2011	SureCall CM2020 68dB	W27th Street, NY, NY, in building	Oscillation detection/shut-down and automatic gain control (AGC)	Significant noise spike (up to -40dB) causing increased ineffective attempts on 2 cell sites, 6 sectors, one carrier (F6). We received numerous customer complaints.	Oscillation caused by donor antenna being located too close to coverage antenna. The oscillation detection/shut-down was ineffective.	5 hours -- easier to find due to street level location. Boosters in high rise buildings have taken us 40+ hours to locate.
1/25/2011	Wilson Smart Tech 801201 Mobile Booster	Four Way, TX, three boosters in company trucks	Oscillation detection/shut-down and AGC	Interference knocked out 2 cell sites	Improper installation, our tech reported that the oscillation shut down feature that is supposed to solve the problem "does not appear to fix the problem in the field"	16 hours
1/5/2011	Wilson Smart Tech Model 801105	Luthersburg, PA, in building	Oscillation detection/shut-down and AGC	Elevated lost call rate on 2 cell sites, 3 sectors	Unknown	5 hours
10/12/2010 to 3/14/2011	Shayam R20 Single Band Repeater	Mt. Pleasant area of Charleston, SC, professionally installed in a hospital	Oscillation suppression and AGC	Increased noise spikes, raising noise floor on all carriers on cellular A and B bands	Location of antennas and poor filters -- though this was professionally installed, our engineers had to relocate antennas and install diplex filters	80 man hours
2/4/2010	Cellular Solutions Model CSI-BDA61080-C	St. Francis Hospital, Columbus, GA, in-building	Oscillation detection and suppression control feature; AGC and amplifier shut-down restart	Major interference on Cellular A and B bands along Manchester Expressway affecting customers near hospital and mall	Equipment problem with booster that needed to be repaired	80+ hours
3/5/2009	Wilson Smart Tech 60DB Cellular Booster -- no model number obtained	Fort Morgan, CO, in-building	Oscillation detection/shut-down and AGC	Major interference affecting 4 cell sites and one carrier (F2).	Installation -- improper isolation between antennas	4 hours
1/5/2009	Wilson Smart Tech Mobile BDA -- no model obtained	Scottsbulff, NE, vehicle owned by Distributor Company	Oscillation detection/shut-down and AGC	Major interference affecting 3 cell sites, 5 sectors and on carrier (F7)	Unit defective	6.5 hours
12/11/2008	Wilson Smart Tech Model 801105	Irwin, PA roof-top	Oscillation detection/shut-down and AGC	Intermittent interference to 3 cells sites, 4 sectors that occurred over a year long period causing noise spikes. The increased noise caused mobiles to have to increase power, which resulted in less coverage at the edge of the network because those mobiles, already operating at high power, could not overcome the noise.	Not sure, suspect both booster design and installation	Approximately 40 man hours were spent trying to track down the source of the noise spikes. We received mulitple complaints from customers.